

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Food Lion, LLC, and Maryland and Virginia
Milk Producers Cooperative Association,
Inc.,

Plaintiffs,

v.

Dairy Farmers of America, Inc.,

Defendant.

Case No. 1:20-cv-00442

**CONSENT MOTION FOR EXTENSION OF TIME
TO RESPOND TO DAIRY FARMERS OF AMERICA, INC.'S
MOTION FOR PROTECTIVE ORDER AS TO PLAINTIFFS'
SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS**

Under Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 6.1, Plaintiffs Food Lion, LLC, and Maryland and Virginia Milk Producers Cooperative Association, Inc., (“Plaintiffs”), respectfully move the Court to extend the time for the Plaintiffs to file a response to Dairy Farmers of America, Inc.’s Motion for Protective Order as to Plaintiffs’ Second Requests for Production of Documents [ECF No. 52], from September 15, 2020 to and including September 17, 2020.

In support of their motion, the Plaintiffs state as follows:

1. On September 1, 2020, Defendant filed, *Defendant Dairy Farmers of America, Inc.’s Motion for Protective Order as to Plaintiffs’ Second Requests for Production of Documents* (the “Motion”). [ECF No. 52].

2. The deadline for Plaintiffs to respond to Defendant's motion is September 15, 2020, thus the time to file and serve a response has not expired. *See* LR 7.3(f); Fed. R. Civ. P. 6(b),(d).

4. The parties have been corresponding and held a meet and confer regarding possible agreement on the Requests for Production subject to the motion. On September 14, 2020, Defendant confirmed that the parties are still at an impasse as to all requests except Nos. 31, 42, and 50.

5. In order to allow Plaintiffs sufficient time to address the remaining issues, Plaintiffs respectfully request a two-day day extension, through and including September 17, 2020.

6. Defendant has consented to the extension requested herein.

7. A proposed order granting the motion is attached.

WHEREFORE, the Plaintiffs respectfully move the Court to enter an Order extending the time for the Plaintiffs to file and serve their response to Dairy Farmers of America, Inc.'s Motion for Protective Order as to Plaintiffs' Second Requests for Production of Documents [ECF No. 52] until and including September 17, 2020.

Respectfully submitted, this the 15th day of September, 2020.

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